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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
THE NORTHERN ASSURANCE COMPANY
OF AMERICA and AMERICAN HOME
ASSURANCE COMPANY,

08 CV 3289 (CSH) (AJP)

Plaintiffs,

Electronically Filed

- against -

LAFARGE NORTH AMERICA, INC. and
AMERICAN STEAMSHIP OWNERS MUTUAL
PROTECTION AND INDEMNITY
ASSOCIATION, INC.

Defendants.

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NOTICE OF MOTION FOR RECONSIDERATION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Plaintiffs The Northern Assurance Company of America and American Home Assurance Company, by and through their undersigned attorneys, will move this Court, Charles S. Haight, U.S.D.J., United States District Court, 500 Pearl Street, Courtroom 17C, New York, New York 10007, on the 27th day of August 2008 at 9:30 a.m., or as soon thereafter as counsel may be heard, for an order, pursuant to Rule 60 of the Federal Rules of Civil Procedure and Local Rule 6.3, granting reconsideration of the Court's Order dated August 4, 2008, and upon

reconsideration, lifting that portion of the Court's Order, which stayed the plaintiffs' First Cause of Action against defendant American Steamship Owners Mutual Protection; or in the alternative, permitting plaintiffs to oppose the American Club's motion for summary judgment in the related action entitled *American Steamship Owners Mutual Protection and Indemnity Association, Inc. v. Lafarge North America, Inc.*, 06 CV 3123.

Dated: August 12, 2008
New York, New York

NICOLETTI HORNIG & SWEENEY

Attorneys for Plaintiffs
The Northern Assurance Company of America
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